



Montana Department of  
**ENVIRONMENTAL QUALITY**

Brian Schweitzer, Governor

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November 28, 2011

Steven A. Petrin  
Stimson Lumber Company  
700 Pacific Building  
520 SW Yamhill Street  
Portland, OR 97204

**RE: Stimson Cooling Pond Project - In-River Rock & Cribbing, Gravel Bar Removal Work Plan**


*STEVEN,*  
Dear Mr. Petrin:

Find attached, the DEQ approved Stimson Bonner Mill - In-River Rock & Cribbing, Gravel Bar Removal Work Plan. Stimson may immediately proceed with the work.

This work plan was a challenge to prepare and I would like to take this opportunity to thank you for your time and patience.

Please feel free to call me at (406) 841 5039 if any questions that may arise.

Respectfully yours,

  
Keith Large  
Project Officer  
Remediation Division

cc Richard Oppen, Director, DEQ  
Bill Kirley, DEQ Legal  
Doug Martin, DOJ-NRD  
Rob Collins, DOJ-NRD  
Pat Saffel, FWP  
Ladd Knotek, FWP  
Jeff Webber, Stimson Lumber Co.  
Max Miller, Jr., Tonkon Torp LLC

## **Stimson Bonner Mill - In-River Rock & Cribbing, Gravel Bar Removal Work Plan - Approved by DEQ, Nov. 28, 2011**

This work plan is intended to satisfy the requirement of the AOC and State's lawsuit to remove additional rock and timber-cribbing material from the Blackfoot River streambed, as conveyed in DEQ's November 7, 2011 letter. The DEQ letter states that materials were not fully removed when the Outer Protective Berm was being removed in the spring of 2011. Stimson will remove the non-native materials, including the timber-cribbing to native alluvium per the terms and agreement of the AOC, associated documents, and this work plan.

**Work to Be Performed:** The materials will be removed by a tracked excavator and loaded into haul trucks. A bulldozer will be used to pioneer the haul road ramp and as otherwise needed. Note that in-river work will be minimized to reduce the generation of turbidity, while still accomplishing the project objective of removing the riprap angular rock and cribbing. DEQ, after consultation with Stimson and the contractor, will determine if additional BMPs are needed once the work begins.

The photo and Figure 1 attached depicts the project area, including the gravel bar areas containing the angular rock and timber cribbing (in the photo, areas marked in red are approximate) to be removed and the proposed haul road on Figure 1 (area marked in red is also an approximate removal area). Available information indicates the gravel bar has a surface elevation of approximately 3250 feet and that the rock is above an elevation of approximately 3247 feet, although the removal of the material to native alluvium may show otherwise.

River rock deposited naturally during the 2011 spring/summer high flows will need to be moved, but not removed, to ensure that large angular rock is not buried beneath this surface. This type of rock maybe left in-place or evenly cast by the excavator operator along the streambed. If the excavator operator digs deep enough to encounter native alluvium at anytime, the native alluvium will be placed back in the hole it came from and the removal will continue into the next adjacent area.

The work will begin in the downstream area and move upstream. The rock removal will start along the northern outside edge of the removal area, i.e. towards the center of the river. The deepest excavation is expected to take place along that northern edge and the cut may be as deep as five or six feet (5-6 feet) to achieve the appropriate removal depth. The southern edge of the cut is expected to be less, but may still be two or three feet (2-3 feet) deep.

As shown on Figure 1, the haul road is below the low water mark along the entire toe of the new riverbank (to avoid damage to the restored bank). The newly established riverbank ties into the original upstream riverbank at Station ~13+85; therefore the river bank between Stations 0+00 and 13+85 will not be disturbed. At Station 14+00 a constructed ramp will begin climbing up the riverbank, reaching the crest of the bank at

approximately Station 15+00. From there the road will continue to the existing stockpile of salvaged riprap located in the East Log Yard, approximately as depicted. The timbers will be segregated nearby until they can be moved by conventional dump trucks to the timber and cribbing storage area.

Once the contractor has a projected completion date, Stimson or the contractor will request approval from DEQ and NRD. Stimson or the contractor will notify DEQ and NRD at least three (3) working days in advance of the needed inspection. Once approval has been granted by both DEQ and NRD, Stimson will reclaim the haul road, which will consist primarily of removing the riverbank ramp.

The disturbed portion of the riverbank will be restored in keeping with adjacent areas of the bank. The width of the disturbance will be limited; a grass seed mixture similar to that used on the restored Cooling Pond riverbank will be applied to achieve revegetation success.

**Health and Safety:** In addition to the contractor approved Health and Safety Plan in use on the Project; the excavator operator will have a life jacket in the cab and window punch-out tool in the cab at all times.

**Schedule:** Stimson and the contractor will attempt to begin the work the week of Nov. 28, 2011 with the mobilization of equipment and personal. The project will likely be completed in an estimated 10 to 15 working days. The ramp and haul road will be developed first, followed by the removal of the rock and timbers. Once the DEQ and NRD have provided the approval as stated above, the haul road ramp will be reclaimed per the requirements of the work plan and permits.